





Department of Toxic Substances Control

700 Heinz Avenue Suite 200 Berkeley, CA 94710-2737

Engineering Field Activity, West Attn Mr. Richard Powell, Code 1832 900 Commodore Drive San Bruno, California 94066-5006

Pete Wilson Governor

James M. Strock Secretary for Environmental Protection

DRAFT FINAL PHASE III RADIATION WORK PLAN HUNTERS POINT ANNEX

Dear Mr. Powell:

The Department of Toxic Substances Control is forwarding the enclosed comments from the Department of Health Services.

November 20, 1996

Should you have any questions regarding this letter, please call me at (510) 540-3821.

Singerely, / hababar

Cyrus Shabahari Project Manager

Office of Military facilities

Enclosure

US EPA, Region IX

Attn: Claire Trombadore [H-9-2]

75 Hawthorne Street

San Francisco, California 94105

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Memorandum

Date

November 15, 1996

Cyrus Shabahari
Department of Toxic Substances Control (DTSC), Region 2
Office of Military Facilities
700 Heinz Avenue, Suite 200

From :

Environmental Management Branch P.O. Box 942732 601 North 7th Street (MS 396)

Berkeley, California 94710

(916) 445-0498

Subject:

Department of Health Services (DHS) review of Responses to Comments on the *Draft Final Phase III Radiation Investigation Work Plan*, Hunters Point Shipyard, San Francisco, California, October 15, 1996 (DHS/DTSC work form # 301)

Attached are DHS' comments on the subject document. This review was performed by Ms. Deirdre Dement in support of the Interagency Agreement between DHS and DTSC. If you need additional information, please contact Ms. Dement at, (916) 324-1378,

Darice G. Bailey

Senior Health Physicist

Attachment

CC:

Mr. David Wright
Office of Military Facilities
Department of Toxic Substances Control, Region 1
10151 Croydon Way, Suite 3
Sacramento, CA 95827

Ms. Deirdre Dement Environmental Management Branch 601 North 7th Street, MS 396 P.O. Box 942732 Sacramento, CA 94234-7320

Department of Health Services

Review of Responses to Comments on the *Draft Final Phase III Radiation Investigation Work Plan*, Hunters Point Shipyard, San Francisco, California, October 15, 1996

November 15, 1996 DTSC Resource Planning Form # 301

The following comments are in response to the request from Mr. Cyrus Shabahari of the Department of Toxic Substances Control to review the revised document *Draft Final Phase III Radiation Investigation Work Plan*, Hunters Point Shipyard, San Francisco, California, October 15, 1996 and responses to comments from the earlier draft document of February 15, 1996 for radiological concerns.

General Comments:

- 1. The responses to comments and the changes and additions to the document appear adequate, unless noted below as needing additional clarification or verification.
- 2. Please verify that Hunters Point Shipyard is another name for Hunters Point Annex, and HPA is equivalent to HPS. Both designations were used in the document.
- 3. Please verify that NUREG-1507 referenced in the newly added Appendix A, Attachment X is to be used in addition to NUREG-5849. If so, this reference should be added to page 6 under Section 2.1, "Radiological Survey Guidance Documents" and to "References" on page 52.

Specific Comments:

- 1. Page 18, Section 3.1.2.1, Building 214 (Room 105), <u>Recommendation</u>. "Building 214" was changed to "Building 215." Please verify that this is a "typo" and will be changed back to the earlier version, "Building 214."
- 2. Page 29, Section 3.1.4.6 Buildings 830 and 831, Site Reconnaissance. Please verify that the "building" referred to includes both Buildings 830 and 831 and that they are owned, instead of leased, by the University of California at San Francisco.
- 3. Page 5 of Responses to Comments, Response to Comment 7(Page 23, Section 3.1.3.6, Building 365). DHS was unable to find the letter attached that references this building. The attached documents only referred to Buildings 815, 364 and 816. The additional responses and additions to pages 23 and 24 of the text appear to adequately address DHS' concerns about this building. Please specify where in the document sent to DHS (Memorandum 165-52, dated 19 August 1979, from A. F. Wardwell, regarding Monitoring and decontamination of ex-NRDL buildings 815, 364 and 816) is the information regarding Building 365. If this information is not available, please clarify or remove the sentence, "These letters are provided as an attachment.", from the response to Comment 7.
- 4. Page X-2, Attachment X of Appendix A. The first sentence of the last paragraph references NUREG-5489. Please verify if this is the correct document or whether it was intended as NUREG-5849.